

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

HEATHER COYLE,)	
)	
Plaintiff,)	Case No. _____
)	
v.)	Initial Interrogatory Answers
)	
GREENVILLE COUNTY SCHOOL)	
DISTRICT; MORGAN CLEMENTS;)	
KAITLYN NOLLER; R. DOUGLAS)	
WEBB; and JOHN & JANE DOES 1-10;)	
)	
Defendants.)	

The Plaintiff, Heather Coyle, hereby answers the Initial Interrogatories as follows:

A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

ANSWER: None known at present.

B. As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: We understand that requests for declaratory judgment are typically decided by the Court, rather than a jury. As for the remaining claims for monetary damages and other relief, Plaintiff is content with having these claims decided by the Court, rather than incurring the added expense and inconvenience of a jury trial. But if one or more of the Defendants wish to try these claims before a jury, Plaintiff has no objections thereto.

C. State whether the party submitting these responses is a publicly owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

ANSWER: No, Plaintiff is not a publicly owned company.

D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER: The Greenville Division is where: (1) Plaintiff resides; (2) a substantial part of the acts or omissions giving rise to her claims occurred; (3) Defendant Greenville County School District (“the District”) does business here; and (4) upon information and belief, the three individual Defendants also reside here. Plaintiff knows of no objections to the appropriateness of this division.

E. Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal?

ANSWER: No. However, in the interests of full disclosure, there is currently pending in state court an action against Defendant District to enforce the South Carolina Freedom of Information Act, *Heather Coyle v. Greenville County School District*, Civil Action No. 2025-CP-23-00041. The SC FOIA action is related to this one because, in that action, Plaintiff is seeking public records related to her former employment and the termination thereof, which is the subject of this action. The next hearing before Judge Gravely is currently scheduled for the week of June 16, 2025. Plaintiff does not believe that the SC FOIA action will disrupt or delay the resolution of this action because the claims in both are legally distinct and arise under different factual circumstances.

F, G, and H are not applicable.

Respectfully submitted this 15th day of April 2025.

/s/ Kevin J. Coyle
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